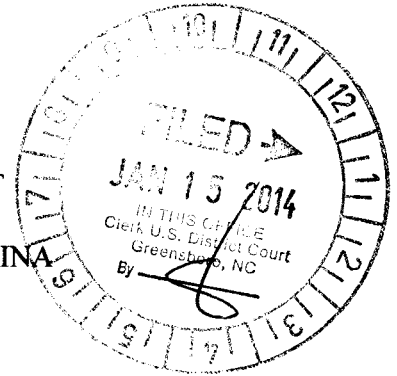


IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT COURT OF NORTH CAROLINA



TYROME M HOLLOMON JR  
Plaintiff.

Case No.

14CV31

-v-

SMITH DEBNAM NARRON DRAKE  
SAINTSING & MYERS, LLP  
Defendant.

**COMPLAINT**

Plaintiff, TYROME M HOLLOMON JR hereby sues Defendant, SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP; and alleges:

**PRELIMINARY STATEMENT**

1. This is an action for damages brought for damages for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681 *et seq.*

**JURISDICTION AND VENUE**

2. The jurisdiction of this Court is conferred by 15 U.S.C. §1681p.
3. Venue is proper in this Circuit pursuant to 28 U.S.C. §1391b.
4. This is an action for damages which do not exceed \$5,000.00.
5. Plaintiff, TYROME M HOLLOMON JR, is a natural person and is a resident of the State of North Carolina.
6. Defendant, SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP, is a North Carolina Corporation, authorized to do business in North Carolina.
7. All conditions precedent to the bringing of this action have been performed, waived or excused.

**FACTUAL ALLEGATIONS**

8. On May 7, 2012, SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP

initiated a hard pull of Plaintiff's credit report from Experian without permissible purpose, thereby reducing his credit score.

**COUNT I**  
**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681**  
**WILLFUL NON-COMPLIANCE BY DEFENDANT SMITH DEBNAM NARRON DRAKE**  
**SAINTSING & MYERS, LLP**

9. Paragraphs 1 through 8 are realleged as though fully set forth herein.

10. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

11. SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

12. SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP willfully violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP willfully violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP for actual or statutory damages, and punitive damages, fees and costs, pursuant to 15 U.S.C. §1681n.

**COUNT II**  
**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681**  
**NEGLIGENT NON-COMPLIANCE BY DEFENDANT AT&T**

13. Paragraphs 1 through 8 are realleged as though fully set forth herein.

14. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. §1681a(c).

15. SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP is a furnisher of information within the meaning of the FCRA, 15 U.S.C. §1681s-2.

16. SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP negligently violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP negligently violated 15 U.S.C. §1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages against SMITH DEBNAM

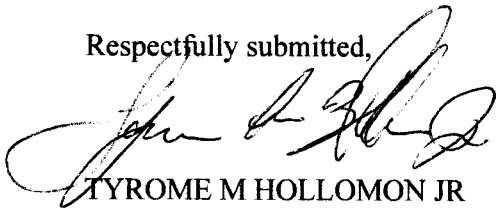
NARRON DRAKE SAINTSING & MYERS, LLP for actual damages, and all fees and costs,  
pursuant to 15 U.S.C. §1681o.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Dated: January 15 2014

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tyrome M. Hollomon Jr.", written over the typed name.

TYROME M HOLLOMON JR  
420 E McCulloch St  
Greensboro, North Carolina 27406  
holloty@gmail.com  
336-389-1254



EXHIBIT A

[Logout](#)
[Report Summary](#)
[Potentially Negative Items](#)
[Accounts in Good Standing](#)
[Requests for Your Credit History](#)
[Personal Information](#)
[Your Personal Statement](#)
[Get Credit Monitor](#)
[Get Credit Score](#)

Are you at risk for  
**IDENTITY THEFT?**

**Low-Risk**

Help reduce your risk with **ProtectMyID™** from Experian

**Get Protected →**

with enrollment in PMID



## Requests for Your Credit History Summary

[Where do you get this information?](#)

[What if I feel there is an error?](#)

Experian credit report prepared for  
**TYROME HOLLOMON**

Your report number is  
**3033-9343-03**

Report date: **January 15, 2014**

### Credit Report Toolkit:

[Print your report](#)  
[Credit Education](#)  
[Know your rights](#)  
[Credit Fraud Center](#)

We make your credit history available to your current and prospective creditors and employers as allowed by law. Personal data about you may be made available to companies whose products and services may interest you. As required by the Fair Credit Reporting Act, we display these requests for your credit history as a record of fact.

[Requests viewed by others](#)

[Requests viewed only by you](#)

### Requests Viewed By Others

According to the Fair Credit Reporting Act, credit grantors with a permissible purpose may request your credit information. When a request for your credit history is made, a record of who made the request and the reason they requested your credit will display on your credit report for two years.

The following information is part of your credit history and is provided to others.

- [WELLS FARGO BANK](#) ➤ Date: June 6, 2012
- [SMITH DEBNAM NARRON WYCH](#) ➤ Date: May 7, 2012
- [IPAYMENT INC](#) ➤ Date: April 6, 2012
- [IPCOM/INTUIT INC](#) ➤ Date: March 28, 2012
- [CAPITAL ONE US CARD](#) ➤ Date: January 17, 2012

### Requests Viewed Only By You

According to the Fair Credit Reporting Act, credit grantors listed in this section had a permissible purpose to request your information. When a request for your information is made, it will display on your credit report for two years.

We report these requests only to you as a record of those who requested your information, and we do not include any of these requests on credit reports to others.

- [EXPERIAN](#) ➤ Date: January 14, 2014 , December 30, 2013 ,  
December 18, 2013 , July 17, 2013 ,  
July 16, 2013 , June 20, 2013 ,  
May 4, 2013 , January 8, 2013
- [AMERICAN EXPRESS 2](#) ➤ Date: January 7, 2014
- [AT&T MOBILITY](#) ➤ Date: December 31, 2013

**Add Triple Alert<sup>SM</sup> Credit Monitoring for only \$4.95 per month!**

**Get the Score!**  
Add your Credit Score for only \$7.95